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U.S. DISTRICT COURT E.D.N.Y.

APR 19 2010

NB:ALC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

LONG ISLAND OFFICE

10-0434M

UNITED STATES OF AMERICA

- against -

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF APPLICATION  
FOR ARREST WARRANT

WAQAS ALI,  
also known as  
"Anthony Christopher  
Salamone, III,"

(18 U.S.C. § 1542)

Defendant.

EASTERN DISTRICT OF NEW YORK, SS:

NEIL J. HORN, being duly sworn, deposes and says that, he is a Special Agent with the Diplomatic Security Service, United States Department of State, duly appointed according to law and acting as such.

On or about May 23, 2008, within the Eastern District of New York, the defendant WAQAS ALI, also known as "Anthony Christopher Salamone, III," did willfully and knowingly make a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws.

(Title 18, United States Code, Section 1542)

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

1. I am a Special Agent with the Diplomatic Security Service of the United States Department of State and have been involved in the investigation of cases involving passport fraud. I am familiar with the facts and circumstances set forth below from my involvement in this investigation, my review of the investigative file and from reports of other law enforcement officers involved in the investigation.

2. Through an investigation concerning possible passport fraud, I learned that the defendant WAQAS ALI, might have obtained fraudulent documentation under the name "Anthony Christopher Salamone, III."

3. On May 23, 2008, a person identifying himself as Anthony Christopher Salamone, III, with a date of birth of November 9, 1987, executed an application for a United States Passport (DS-11) at the United States Post Office, located in Patchogue, Suffolk County, New York. Attached to the passport application was a photograph of the applicant. In support of his application, the individual presented as proof of identity a Connecticut identification card, in the name of Anthony

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

Christopher Salamone, III. As proof of citizenship, the individual presented an Affidavit of Identifying Witness executed by an individual who was identified on the application as the applicant's mother (hereafter "Witness 1"). The applicant took an oath administered by the acceptance clerk swearing or affirming that the information contained in the passport application was true, and signed the application before the clerk.

4. Law enforcement databases indicate that Anthony Christopher Salamone, III, was arrested on November 29, 2006 in Patchogue, New York. Your affiant has reviewed photographs of Anthony Christopher Salamone, III, taken in connection with the arrest and found that the individual depicted therein does not match the individual depicted in the photograph attached to the passport application in the name of "Anthony Christopher Salamone, III" that was executed on May 23, 2008.

5. Law enforcement databases indicate that the defendant WAQAS ALI was arrested by the Suffolk County Police Department on May 2, 2001. Your affiant reviewed the photographs taken of the defendant in connection with the arrest and found the individual depicted therein matches the individual depicted in the photograph attached to the passport application in the name of "Anthony Christopher Salamone, III" that was executed on May 23, 2008.

6. Your affiant has also reviewed photographs contained in immigration records of the defendant WAQAS ALI and found that the individual depicted therein matches the individual depicted in the photograph attached to the passport application in the name of "Anthony Christopher Salamone, III" that was executed on May 23, 2008.

7. On February 24, 2010, your affiant interviewed Witness 1 in East Patchogue, New York. Witness 1 stated, in sum and substance, that she completed the Affidavit of Identifying Witness in order to help the defendant WAQAS ALI.

8. On February 24, 2010, your affiant interviewed Anthony Christopher Salamone, III. The individual I interviewed matched the individual depicted in photographs taken in connection with the November 29, 2006 arrest of Anthony Christopher Salamone, III. Anthony Salamone stated, in sum and substance, that he did not have any identification cards for any state other than New York and that he has never allowed another individual to use his identification.

WHEREFORE, your deponent respectfully requests that the defendant WAQAS ALI, also known as "Anthony Christopher Salamone, III," be dealt with according to law.



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NEIL J. HORN  
Special Agent  
United States Department of State

Sworn to before me this  
19th day of April, 2010

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THE HONORABLE WILLIAM D. WALL  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK